



November 1, 2016

David Sholes
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Re: Comments on the Buena Vista Water Quality Coalition Groundwater Quality Management Plans

Dear Mr. Sholes,

Thank you for the opportunity to comment on the Buena Vista Water Quality Coalition Groundwater Quality Management Plans (Plans). While we acknowledge Buena Vista is a smaller coalition than many in the Central Valley, it is still required to fully comply with the terms of the General Order. The Plan outlines some beneficial practices currently being implemented, including crop changes, and accompanying improvements to nutrient application and irrigation management, but these actions do not excuse the Coalition from the Order's requirements. Overall, the Plans deviate from the Order on a number of issues and denies the causes, both historic and current, of serious nitrate contamination of the aquifer. Thus, the plan does not comply with the Order, Irrigated Lands Regulatory Program, nor the Porter-Cologne Water Quality Control Act.

First of all, it is irresponsible to ignore the negative impact of historic and current agricultural practices upon water quality. The presence of nitrates, in excess of MCLs, is rarely the result of a single discharge or isolated events. Rather, high levels of nitrate contamination is indicative of "systemic deficiencies" in farming practices that have persisted for decades. Widespread nitrate contamination is prevalent in agricultural regions across California, and the Central Valley is certainly no exception. This also conflicts with a later section of the Plan which states it will continue on the path toward compliance where "agriculture is confirmed as a potential source...". To put it simply, failure to acknowledge that agricultural practices have been (and still are) deficient in protecting water quality will not result in an effectively implemented plan.

More specifically, the following outlines some of the concerns we have with the Plan:

- **Inventory of Management Practices:** We appreciate that Buena Vista is a smaller district who works closely with their growers on a regular basis and thus additional outreach and data collection may not appear as pressing as it is with other coalitions. However, without adequate collection of data it is impossible for the Regional Board to assess whether the Coalition and its members are meeting the requirements of the Order. Thus Appendix C is not a sufficient substitute for a baseline inventory of existing management practices.
- **Domestic well data:** It is unclear if the Coalition has pulled the well logs for domestic wells located within their jurisdiction. We agree that the lack of water quality data from domestic wells makes the development of plans such as this one difficult to prepare. It is very telling as to the health of the basin

that the Coalition believes that there are very few wells due to poor groundwater quality and we hope the Coalition will focus on how to improve this issue.

- **Follow-up from monitoring results:** We are encouraged by the Coalition's plan to develop a pilot project in the case where current practices prove to be ineffective at reducing contamination and meeting water quality objectives. However, it is unclear what that pilot project would entail. We expect this would include a requirement that BMPs are incorporated into on-farm practices, but believe some discussion as to what a pilot project is expected to entail is necessary to be included since there is relatively little discussion as to BMPs throughout the Plans.
- **Crops to reduce nitrate loading:** We also appreciate the discussion on crop changes as a means of reducing nitrates loading to groundwater. However, the particular example used by the Coalition – moving from a row crop to a tree crop – raises several other concerns, such as impacts to water supply. During times of drought, tree crops are less likely to be fallowed, due to the higher investment of planting such crops, than row crops. This caused significant strain on the aquifer. Lower groundwater levels can also lead to higher concentration of contaminants. In general though this is a concept that should be further researched to determine what are the best crops to swap out in order to reduce nitrates leaching to groundwater.
- **Pathways to compliance:** While we acknowledge that the Plan states it will pursue the pathway where agriculture is confirmed to be a potential source and thus the Plan will work to control practices in order to meet water quality objectives, it is alarming that the Plan even mentions that ignoring the problem due to economic or feasibility concerns is even an option. While many best management practices currently do not completely eliminate nitrate leaching to groundwater, there are many practices that are not being widely implemented which reduce loading.

Thank you for providing us the opportunity to comment on these documents. We look forward to working with your staff and the coalitions on the implementation of this and other Groundwater Management Plans.

Sincerely,



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